

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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March 28, 2022

**Via Electronic Filing**

The Honorable Judge Margo K. Brodie  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza E  
New York, NY 11201

Re: *Adams v. The Alcove Restaurant Inc. et al*  
Case No.: 1:21-cv-03738-MKB-TAM

Dear Honorable Judge Brodie:

This law firm represents Defendant The Alcove Restaurant Inc. (the “Defendant”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(A) and 1(F), this letter respectfully serves to request an extension of Defendants’ time to reply or otherwise respond to Plaintiff’s Complaint to be extended through and including April 28, 2022. The parties also respectfully request an adjournment of the conference scheduled this Wednesday to a date in May convenient for the Court.

This is the first request of its nature, and is made on consent of Plaintiff’s counsel. If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the undersigned counsel has recently been engaged [*see* Dckt. Nos. 15-16] and requires additional time to gather information from Defendants to respond to the Complaint.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Joshua D. Levin-Epstein  
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VIA ECF: All Counsel